

**ZVRS**

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REDACTED, FOR PUBLIC INSPECTION

November 21, 2016

**VIA HAND DELIVERY AND ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, D.C. 20554

**RE: Annual Report of CSDVRS, LLC for Continued Certification as a VRS Provider  
CG Docket Nos. 10-51, 03-123 and Request for Confidential Treatment: CG Docket  
Nos. 10-51, 03-123**

Dear Ms. Dortch:

CSDVRS, LLC d/b/a ZVRS ("ZVRS") hereby submits its annual report detailing its compliance with the Telecommunications Relay Service ("TRS") rules.<sup>1</sup> In accordance with the Federal Communications Commission's ("Commission") rules,<sup>2</sup> attached are one original and four copies of the report. A redacted version for public inspection is being electronically filed via the Commission's Electronic Comment Filing System.

Pursuant to 47 C.F.R. §§ 0.457, 0.459, ZVRS requests that the Commission provide confidential treatment for the company-specific, highly sensitive and proprietary commercial information in the attached report and withhold that information from public inspection. The confidential information has been redacted from the version electronically filed with the Commission. In addition, the confidential information constitutes highly sensitive commercial information that falls within Exemption 4 of the Freedom of Information Act ("FOIA").

In support of this request and pursuant to Section 0.459(b) of the Commission's rules, ZVRS hereby states as follows:

**1. Identification of the specific information for which confidential treatment is sought.**

ZVRS requests confidential treatment with respect to the confidential information redacted from the version filed electronically with the Commission.

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<sup>1</sup> See 47 C.F.R. § 64.6060(g).

<sup>2</sup> See 47 C.F.R. §§ 0.457, 0.459, 1.419.



**2. Identification of the circumstance giving rise to the submission.**

ZVRS is submitting its annual report on its compliance with the TRS rules, in accordance with 47 C.F.R. § 64.606(g). The annual report includes updated corporate proprietary information per the requirements of 47 C.F.R. § 64.606(g).

**3. Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.**

The confidential information in the ZVRS annual compliance report is highly sensitive commercial information specific to the operations and strategies of ZVRS. This information is generally safeguarded from competitors and is not made available to the public.

**4. Explanation of the degree to which the information concerns a service that is subject to competition.**

The confidential information involves VRS, a nationwide competitive service.

**5. Explanation of how disclosure of the information could result in substantial competitive harm.**

Disclosure of the redacted information could cause substantial competitive harm to ZVRS, because it would provide competitors insight into confidential operational and strategy information, including the company's critical infrastructure, that would not otherwise be available, which would work to ZVRS's severe competitive disadvantage.

**6. Identification of any measures taken to prevent unauthorized disclosure.**

ZVRS routinely treats the redacted information as highly confidential and exercises significant care to ensure that such information is not disclosed to its competitors or the public.

**7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.**

ZVRS does not make the redacted information available to the public, and this information has not been previously disclosed to third parties, except where required by the Commission and the TRS Fund Administrator, each of whom protect the confidentiality of such submissions.



**8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.**

ZVRS requests that the redacted information be treated as being confidential on an indefinite basis as it cannot identify a date certain on which this information could be disclosed without causing competitive harm to ZVRS.

Respectfully submitted,

/s/ Gregory Hlibok

Gregory Hlibok  
General Counsel and Compliance Officer  
CSDVRS, LLC d/b/a ZVRS  
600 Cleveland Street, Suite 1000  
Clearwater, FL 33755

Enclosure

cc: Eliot Greenwald  
TRReports@fcc.gov



**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Telecommunications Relay Services and	)	CG Docket No. 03-123
Speech-to-Speech Services for Individuals	)	
with Hearing and Speech Disabilities	)	
	)	
Structure and Practices of the Video Relay	)	CG Docket No. 10-51
Service Program	)	
	)	

**ANNUAL REPORT OF CSDVRS, LLC FOR CONTINUED  
CERTIFICATION AS A VIDEO RELAY SERVICES  
PROVIDER**

**1. Introduction**

Pursuant to 47 C.F.R. § 64.606(g), CSDVRS, LLC (d/b/a ZVRS) (“CSDVRS”) hereby submits its annual report as a certified provider of Video Relay Services (“VRS”). CSDVRS received conditional certification to provide VRS under its current ownership structure on December 22, 2014.<sup>1</sup> CSDVRS continues to (1) meet or exceed all non-waived operational, technical, and functional mandatory minimum standards contained in the Commission’s rules; (2) does not differ from the mandatory minimum standards; and (3) makes available adequate procedures and remedies for ensuring ongoing compliance with the Commission’s rules, including informational materials to VRS users on complaint procedures sufficient for these users to know the proper procedures for filing complaints. CSDVRS has

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<sup>1</sup> *Notice of Grant of Conditional Certification for CSDVRS, LLC to Provide Video Relay Service After Its Acquisition by Kinderhook Capital Fund JV, L.P.*, Public Notice, DA 14- 1887, 29 FCC Red 16237, CG Docket Nos. 03-123, 10- 51 (Dec. 22, 2014) (“*Public Notice*”); *see also Order*, 30 FCC Red 583 (CGB rel. Jan. 28, 2015 (dismissing late-filed Opposition to *Public Notice*). CSDVRS filed an application for full certification on February 20, 2015 which remains pending. *See Application of CSDVRS, LLC D/B/A ZVRS, as Indirectly Majority-Owned and Controlled by Kinderhook, for Full Certification to Provide Video Relay Service*, CG Docket Nos. 03-123, 10- 51 (filed Feb. 20, 2015).

timely and consistently submitted reports and other information required of it under the TRS rules and attests that it will continue to timely file all of the required reports and other information in full compliance with the TRS rules.

CSDVRS is concurrently filing an amendment to its pending application for full certification which includes updated exhibits and is incorporated by reference herein. The application, as amended, remains true and accurate.

## 2. Continued Qualifications for Certification

CSDVRS describes below how it currently meets or exceeds and will continue to meet all non-waived mandatory minimum standards for VRS provided in 47 C.F.R. § 64.604:

**A. Communication Assistants (“CAs”) Video Interpreters.** All CAs at CSDVRS continue to meet the same service level standards, receive the same training, and enjoy the same high quality working conditions and employment practices described in CSDVRS’ application. All CSDVRS CAs are qualified interpreters capable of interpreting effectively, accurately and impartially, both receptively and expressively, using any required specialized vocabulary.<sup>2</sup> All CSDVRS CAs are required to have competent skills in grammar, spelling, and familiarity with deaf, hard of hearing and other disability cultures, languages and etiquette, and possess clear and articulate voice communications.<sup>3</sup> All CAs continue to receive training to ensure that they effectively meet the specialized communication needs of deaf and hard of hearing individuals.<sup>4</sup> CSDVRS CAs are required to stay on each call for a minimum of ten minutes (unless the CA and the VRS user are not able to communicate effectively and transmit conversations in real time).<sup>5</sup>

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<sup>2</sup> 47 C.F.R. § 64.604(a)(1)(iv).

<sup>3</sup> 47 C.F.R. § 64.604(a)(1)(ii).

<sup>4</sup> 47 C.F.R. § 64.604(a)(1)(i).

<sup>5</sup> 47 C.F.R. § 64.604(a)(1)(v); *see also Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Order, CG Dkt. No. 03-123, FCC 06-81, 9 (June 16, 2006).

CSDVRS makes its best efforts to accommodate requests for CAs of a specific gender when a call is initiated or during a transfer to a new CA.<sup>6</sup> CAs are strictly compensated on an hourly basis and are not compensated, given a preferential work schedule or otherwise provided a benefit based upon the number of VRS minutes or calls that the CA handles, either individually or as part of a group.<sup>7</sup> All CSDVRS CAs are employees of the company.

**B. Confidentiality and Conversation Content.** CSDVRS continues to prohibit its CAs from disclosing the contents of any relayed conversation and keeping records of the content of calls beyond the duration of the call.<sup>8</sup> CSDVRS also continues to prohibit its CAs from intentionally altering a relayed conversation and requires that conversations are translated verbatim unless directed otherwise by the callers.<sup>9</sup> CSDVRS also continues to maintain strict confidentiality of all VRS calls by limiting access to its call centers only to authorized personnel.

**C. Types of Calls.** CSDVRS continues to prohibit its CAs from refusing single or sequential calls or limiting the length of calls.<sup>10</sup> CSDVRS continues to be capable of handling all types of calls that have not been waived by the FCC.<sup>11</sup> CSDVRS CAs alert callers when they have dialed a number answered by a recorded message and interactive menu.<sup>12</sup> CSDVRS does not impose any charges for additional calls, which may be made by the relay user in order to complete calls involving recorded or interactive messages. CSDVRS supports speed dialing

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<sup>6</sup> 47 C.F.R. § 64.604(a)(1)(vi).

<sup>7</sup> 47 C.F.R. § 64.604(c)(5)(iii)(N)(3).

<sup>8</sup> 47 C.F.R. § 64.604(a)(2)(i).

<sup>9</sup> 47 C.F.R. § 64.604(a)(2)(ii).

<sup>10</sup> 47 C.F.R. § 64.604(a)(3)(i).

<sup>11</sup> 47 C.F.R. § 64.604(a)(3)(ii); *see also Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; E911 Requirements for IP-Enabled Service Providers, Order*, CG Docket No. 03- 123 and WC Docket No. 05-196, Order, 27 FCC Red 7113 (COB 2012); *Report on Waivers by CSDVRS, LLC.*, CG

Docket Nos . 03-123 and 10-5 1, WC Docket No. 05- 196 (April 15, 2013).

<sup>12</sup> 47 C.F.R. § 64.604(a)(3)(vii), codified for TTY users, has been implemented by CSDVRS to the extent practicable for VRS.

and three-way calling functionalities.<sup>13</sup> When requested to do so, CSDVRS interpreters can also leave voice messages on voice mail systems and retrieve voice messages for callers.<sup>14</sup> CSDVRS also continues to provide video mail service so that hearing callers may leave messages when the recipient is unavailable. CSDVRS has enabled the following functionalities: 1) single line VCO in situations where the relay user's CPE is provided by CSDVRS; 2) two-line VCO; 3) VCO-to- TTY service; 4) VCO-to-VCO calling; 5) single line hearing carry over ("HCO") where the relay user's CPE is provided by CSDVRS; and 6) HCO-to-TTY service. In lieu of providing equal access to interexchange carriers, CSDVRS has handled and will continue to handle domestic long distance calls at no charge to its users.

**D. Emergency Call Handling.** An inbound 911 call continues to be prioritized by CSDVRS ahead of all incoming VRS calls and is automatically and immediately connected with the appropriate Public Safety Answering Point ("PSAP").<sup>15</sup> The emergency call handling process remains the same as described in CSDVRS' application. For a dialed around emergency call, the CA collects the name and location information of the caller to connect with the appropriate PSAP.<sup>16</sup> CSDVRS ensures that any information obtained as a result of handling an emergency call is made available only to PSAP or law enforcement personnel and is used for the sole purpose of identifying the caller's location or for some other emergency or law enforcement purposes.<sup>17</sup> CSDVRS obtains from all of its customers prior to initiation of service a registered location,<sup>18</sup> and provides them with several methods of updating their registered

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<sup>13</sup> 47 C.F.R. § 64.604(a)(3)(vi).

<sup>14</sup> 47 C.F.R. § 64.604(a)(3)(viii).

<sup>15</sup> 47 C.F.R. § 64.604(a)(4) applies to TTY-based TRS providers, 47 C.F.R. § 64.605 provides the additional emergency calling requirements for internet-based TRS providers.

<sup>16</sup> 47 C.F.R. § 64.605(a)(2)(iii).

<sup>17</sup> 47 C.F.R. § 64.605(a)(2)(vi).

<sup>18</sup> 47 C.F.R. § 64.605(b)(4)(i).

location at will, in a timely manner, and including the use of iTRS access technology.<sup>19</sup> For each 911 call, CSDVRS transmits to the PSAP or appropriate local emergency authority information from or through the appropriate automatic location (“ALI”) database,<sup>20</sup> and ensures that the PSAP has the Automatic Number Identification (“ANI”), the caller’s registered location, the name of the VRS provider and the CA’s identification number.<sup>21</sup> All 911 calls are routed by CSDVRS through the use of ANI via the dedicated Wireline E9 11 Network.<sup>22</sup> CSDVRS also can immediately re-establish contact with the TRS user and the appropriate emergency authority and resume handling the call in the event one leg of the call is disconnected.<sup>23</sup>

**E. Visual Privacy Screens/Idle Calls.** CSDVRS continues to prohibit its CAs from using privacy screens and requires the disconnection of a VRS call if a party enables a privacy screen or similar feature or is otherwise unresponsive or unengaged for more than 5 minutes, unless it is an emergency call or is legitimately on hold and is present and waiting for active communications to commence.<sup>24</sup>

**F. International Calls.** CSDVRS continues to prohibit VRS calls which originate from an international IP address with the exception of calls made by customers who have pre-registered with CSDVRS the specified time periods and regions of their travel, and CSDVRS verifies the identity and location of such callers.<sup>25</sup>

**G. Speed of Answer.** CSDVRS continues to meet or exceed the FCC’s requirement for at least 80 percent of all VRS calls to be answered within 120 seconds, measured on a monthly

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<sup>19</sup> 47 C.F.R. § 64.605(b)(4)(ii).

<sup>20</sup> 47 C.F.R. § 64.605(b)(2)(iv).

<sup>21</sup> 47 C.F.R. § 64.605(b)(2)(ii).

<sup>22</sup> 47 C.F.R. § 64.605(b)(2)(iii).

<sup>23</sup> 47 C.F.R. § 64.605(a)(2)(v).

<sup>24</sup> 47 C.F.R. § 64.604(a)(6).

<sup>25</sup> 47 C.F.R. § 64.604(a)(7).



basis.<sup>26</sup> CSDVRS will also ensure adequate call center staffing to ensure that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.<sup>27</sup>

**H. TRS Facilities.** CSDVRS continues to provide VRS in real-time 24 hours a day, 7 days a week, offering English-speaking sign language interpreters for deaf customers, tri-lingual interpreters for Spanish users, and voice carryover technologies for hard of hearing users.<sup>28</sup> The CSDVRS network continues to incorporate redundancy as described in its application in every single aspect, throughout its data processing and storage facilities, hardware, software, public and private networks, and connections, to ensure reliable and continuous service.<sup>29</sup> CSDVRS continues to ensure that its CAs do not relay calls from a location primarily used as a residence.<sup>30</sup> CSDVRS continues to independently own and operate its automatic call distribution (“ACD”) platform.<sup>31</sup>

**I. Caller ID.** CSDVRS continues to automatically transmit to the called party the ten digit number of the calling party, when available, or the CSDVRS’ facility number.<sup>32</sup>

**J. Public Access to Information.** CSDVRS continues to engage in vigorous outreach efforts to all segments of the public through various print and internet media to ensure that callers throughout the country are aware of the availability and use of VRS and ten-digit

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<sup>26</sup> 47 C.F.R. §§ 64.604(b)(2)(iii).

<sup>27</sup> 47 C.F.R. § 64.604(b)(2)(i).

<sup>28</sup> 47 C.F.R. § 64.604(b)(4)(i).

<sup>29</sup> 47 C.F.R. § 64.604(b)(4)(ii).

<sup>30</sup> 47 C.F.R. § 64.604(b)(4)(iii).

<sup>31</sup> 47 C.F.R. § 64.604(b)(4)(iv).

<sup>32</sup> 47 C.F.R. § 64.604(b)(6).

numbering.<sup>33</sup> This is accomplished through attendance at deaf conferences and gatherings, providing an educational website, distributing e-mails containing information and updates about VRS, and working through affiliate state associations to educate their communities.

**K. Rates.** CSDVRS continues to handle long distance calls at no charge to its users.<sup>34</sup>

**L. Data Collection and Audits.** CSDVRS continues the same procedures for tracking and reporting true and accurate call data as well as other historical and projected information as described in its application.<sup>35</sup> CSDVRS continues to employ an automated record keeping system to capture call record and speed of answer compliance data<sup>36</sup> and submits such data electronically, in a standardized format, without allowing human intervention during the call session for either conversation or session time.<sup>37</sup> A CSDVRS' senior executive with first-hand knowledge always certifies the accuracy and completeness of the information provided.<sup>38</sup> CSDVRS' reporting has proven complete, reliable, and effective for the TRS Fund Administrator with consequentially minimal or no withholdings. CSDVRS has always submitted to Commission audits and commits to continuing to do so in the future.<sup>39</sup> CSDVRS retains all of its call detail records and other substantiating information reported, in an electronic format, for a minimum of five years.<sup>40</sup>

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<sup>33</sup> 47 C.F.R. § 64.604(c)(3).

<sup>34</sup> 47 C.F.R. § 64.604(c)(4).

<sup>35</sup> 47 C.F.R. § 64.604(c)(5)(iii)(C) and (D).

<sup>36</sup> 47 C.F.R. § 64.604(c)(5)(iii)(D)(4)(i).

<sup>37</sup> 47 C.F.R. § 64.604(c)(5)(iii)(D)(4)(ii).

<sup>38</sup> 47 C.F.R. § 64.604(c)(5)(iii)(D)(5).

<sup>39</sup> 47 C.F.R. § 64.604(c)(5)(iii)(D)(6).

<sup>40</sup> 47 C.F.R. § 64.604(c)(5)(iii)(D)(7).

**M. Whistleblower Protections.** CSDVRS continues to provide an accurate and complete description of the TRS whistleblower protections to all employees and contractors in writing, including in its employee handbook.<sup>41</sup>

**N. Eligibility for Reimbursement.** CSDVRS continues to offer without fail its services in a manner which clearly identifies it as the provider of such service (under its doing business as name “ZVRS”) and always clearly identifies itself as the eligible VRS provider when it utilizes a sub-brand (e.g., HolaVRS).<sup>42</sup> CSDVRS continues not to contract with a third party to provide interpretation services or call center functions.<sup>43</sup> All third-party contracts to provide CSDVRS with services or functions related to the provision of VRS other than interpretation services or call functions are in writing and available to the Commission or the TRS Fund Administrator upon request.<sup>44</sup>

**1. Call Center Reports.** CSDVRS has without fail timely filed written reports with the Commission and the TRS Fund Administrator providing the required call center information and at least 30 days advance notification of any change of call centers.<sup>45</sup>

**O. Remote Training Session Calls.** CSDVRS continues not to arrange, schedule, sponsor, host, conduct or promote remote training sessions or comparable activity which involve VRS calls.<sup>46</sup>

**P. Complaint Procedures.** All complaint procedures described in the application remain in effect, including those for the handling of complaints. CSDVRS remains prepared

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<sup>41</sup> 47 C.F.R. § 64.604(c)(5)(iii)(M).

<sup>42</sup> 47 C.F.R. § 64.604(c)(5)(iii)(N)(1)(ii).

<sup>43</sup> 47 C.F.R. § 64.604(c)(5)(iii)(N)(1)(iii).

<sup>44</sup> 47 C.F.R. § 64.604(c)(5)(iii)(N)(1)(v).

<sup>45</sup> 47 C.F.R. § 64.604(c)(5)(iii)(N)(2).

<sup>46</sup> 47 C.F.R. § 64.604(c)(5)(iii)(N)(4).

to comply with all procedures and time frames specified in the Commission's rules for the resolution of consumer formal or informal complaints filed against CSDVRS.<sup>47</sup> CSDVRS has without fail timely submitted consumer complaint logs. CSDVRS' designated agent for receiving complaints, inquiries, orders, decisions and notices from the Commission is Gregory Hlibok, Compliance Officer, 600 Cleveland St., Suite 1000, Clearwater, Florida 33755, 443-574-7042, [ghlibok@zvrs.com](mailto:ghlibok@zvrs.com).

**Q. End-User Information.** Any customer information that CSDVRS acquires is used only for the purpose of connecting TRS users with called parties, and is not sold, distributed, shared or revealed in any other way.<sup>48</sup> As further provided below, CSDVRS will fully comply with the rules pertaining to the handling of customer proprietary network information ("CPNI").

**R. Discrimination and Preferences.** CSDVRS has not and will not: (i) directly or indirectly, by any means or device, engage in any unjust or unreasonable discrimination related to practices, facilities, or services for or in connection with like relay service; (ii) engage in or give any undue or unreasonable preference or advantage to any particular person, class of persons, or locality; or (iii) subject any particular person, class of persons, or locality to any undue or unreasonable prejudice or disadvantage.<sup>49</sup>

**S. Unauthorized and Unnecessary Use of VRS.** CSDVRS has not and will not engage in any practice that causes or encourages: (i) false or unverified claims for TRS Fund compensation; (ii) unauthorized use of VRS; (iii) the making of VRS calls that would not otherwise be made; or (iv) the use of VRS by persons who do not need the service in order

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<sup>47</sup> 47 C.F.R. §§ 64.604(c)(6).

<sup>48</sup> 47 C.F.R. § 64.604(c)(7).

<sup>49</sup> 47 C.F.R. § 64.604(c)(12).

to communicate in a functionally equivalent manner.<sup>50</sup> CSDVRS will not seek payment from the TRS Fund for any minutes of service it knows or has reason to know are resulting from such practices. If CSDVRS becomes aware of such practices being or having been committed by any person, CSDVRS will, as soon as practicable, report such practices to the Commission or the TRS Fund Administrator. CSDVRS requires their CAs to immediately terminate any call which does not involve an individual eligible to use VRS or, pursuant to the TRS rules and/or the provider's policies, the call does not appear to be a legitimate VRS call; CSDVRS will not seek compensation for such calls.

**T. Notification of Substantive Changes.** CSDVRS has always and confirms that it will continue to notify the FCC of substantive changes within 60 days of the time that such changes occur, and to certify continued compliance with the FCC's minimum standards after such changes are implemented.<sup>51</sup>

**U. Service Interruptions.** CSDVRS commits to providing VRS without unauthorized voluntary service interruptions.<sup>52</sup> If for some reason CSDVRS seeks to voluntarily interrupt service or in the event of an unforeseen service interruption due to circumstances beyond its control, CSDVRS will seek advance authorization or timely provide information to the Commission via written notice and the public through an accessible web site as prescribed in the TRS rules.<sup>53</sup>

**V. Default Provider.** CSDVRS continues the registration process described in its application for VRS users to obtain geographically appropriate North American Numbering Plan

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<sup>50</sup> 47 C.F.R. § 64.604(c)(13).

<sup>51</sup> 47 C.F.R. § 64.606(f)(2).

<sup>52</sup> 47 C.F.R. § 64.606(h)(1).

<sup>53</sup> 47 C.F.R. § 64.606(h)(2) and (3).

telephone numbers prior to service.<sup>54</sup> CSDVRS continues to require its customers to self-certify in accordance with the TRS rules as part of registration, maintains the confidentiality of the registration and certification information and verifies that the location provided by the customer in registering is complete, accurate and in the United States or its territories, that the user is deaf, hard of hearing, or has a speech disability and needs VRS to communicate with others, and understands that the cost of VRS calls is paid for by contributions made by other telecommunications users to the TRS Fund. CSDVRS continues to provide the required user notifications to VRS users through its website and customer support.<sup>55</sup> CSDVRS continues to obtain and handle routing information compliant with the TRS rules as described in its application.<sup>56</sup> CSDVRS does not provision proxy numbers.<sup>57</sup> CSDVRS continues not to issue VRS users toll free numbers, linking any VRS user's subscribed toll free number from a toll free service provider with a geographically appropriate NANP number in the TRS Numbering Directory.<sup>58</sup>

CSDVRS commits to strict compliance with the TRS rules on changes to default TRS providers.<sup>59</sup> CSDVRS, either directly or through its numbering partner, will not port a number prior to obtaining verified authorization from the user by a written or electronically signed authorization. CSDVRS will maintain for at least 5 years all records of the verified authorization. CSDVRS will implement the port within 60 days of verification. During the port, CSDVRS will not (i) reduce the level or quality of service, or (ii) reduce the functionality of VRS access technology. CSDVRS' letter of authorization is a separate document, located on a separate screen

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<sup>54</sup> 47 C.F.R. § 64.611.

<sup>55</sup> 47 C.F.R. § 64.611(g).

<sup>56</sup> 47 C.F.R. §§ 64.611(a)(1),(c)(1),(2), and (t).

<sup>57</sup> 47 C.F.R. § 64.611(d).

<sup>58</sup> 47 C.F.R. § 64.611(e); 47 C.F.R. § 64.613(a)(3).

<sup>59</sup> 47 C.F.R. §§ 64.631-64.636.

or webpage and is titled “Letter of Authorization to Change my Default Provider.” CSDVRS requires that the letter of authorization be signed and dated. CSDVRS letters of authorization submitted with an electronically signed authorization include the consumer disclosures required by Section 101(c) of the Electronic Signatures in Global and National Commerce Act. CSDVRS’ letter of authorization is printed with a type of sufficient size and readable type to be clearly legible and contains clear and unambiguous language that confirms: (1) the user’s registered name and address and each telephone number; (2) the decision to change the default provider; (3) that the user designates CSDVRS to act as the iTRS user’s agent and authorizing the new default provider to implement the default provider change; and (4) that the user understands that only one iTRS provider may be designated as the TRS user’s default provider for any one telephone number. CSDVRS does not and will not affect freezes which prevent a change in a user’s default provider selection unless the user provides express consent.

When informed by a user or original default provider of an unauthorized default provider change, CSDVRS will (i) notify the FCC’s Consumer and Governmental Affairs Bureau (CGB) and (ii) inform that iTRS user of the right to file a complaint with the CGB. CSDVRS will also inform the iTRS user that they may contact and file a complaint with the alleged unauthorized default provider. Not more than 30 days after notification, CSDVRS will provide to the CGB a copy of any valid proof of verification of the change. CSDVRS will identify for the Fund Administrator, Rolka Loube, any minutes associated with the user after the date of the alleged unauthorized change.

**W. Interoperability and Portability.** All VRS users are able to place a VRS call through any of the CSDVRS products. CSDVRS is able to receive calls from, and make calls to, any VRS user. CSDVRS does not and will not take steps that restrict a user’s unfettered access to

another provider's service, such as providing degraded service quality to VRS users using VRS equipment or service with another provider's service. CSDVRS will ensure that its VRS access technologies and their video communication service platforms are interoperable with the planned implementation of the VRS Access Technology Reference Platform, including for point-to-point calls. CSDVRS will ensure that their VRS access technologies and their video communication service platforms are interoperable with any Accessible Communications for Everyone application and platform, including for point-to-point calls when the application or platform becomes operational.

**X. CPNI.** CSDVRS does not and will not track, use, disclose or permit access to CPNI related to a customer call to a competing provider. CSDVRS has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. CSDVRS provides access to and requires all personnel, including any agents, contractors, and subcontractors, who have contact with customers to initially verify the status of a customer's CPNI approval. CSDVRS provides CPNI training, maintains a record of CPNI use, establishes a supervisory review process, certifies compliance on an annual basis, and notifies CGB if the opt-out process fails. CSDVRS provides individual notice including all the required information to customers when soliciting approval to use, disclose, or permit access to customers' CPNI. CSDVRS follows the limits on the permissible use, disclosure and access to CPNI. CSDVRS understands that it may obtain opt-in approval to use CPNI through written, oral, electronic, or sign language methods and that such approval or disapproval must remain in effect until the customer revokes, whether in written, oral, electronic, or sign language methods. CSDVRS maintains records of approval during the time period that the approval or disapproval is in effect and for at least one year thereafter. CSDVRS provides notification to obtain opt-out approval through electronic or written methods, but not by oral or sign language communication (except



to obtain limited, one-time use of CPNI for inbound and outbound customer telephone, TRS, or point-to-point contacts for the duration of the call). CSDVRS requires a 30-day minimum period of wait time after giving customers notice and an opportunity to opt- out before assuming customer approval to use, disclose, or permit access to CPNI. CSDVRS authenticates a customer prior to disclosing CPNI based on a customer-initiated telephone contact, TRS call, point-to-point call, online account access, or an in-store visit. CSDVRS notifies law enforcement of a breach of its customers' CPNI as provided in the TRS rules, and does not notify its customers or disclose the breach publicly, whether voluntarily or under state or local law or these rules, until it has completed the process of notifying law enforcement.<sup>60</sup>

### **3. Certification Documentation**

In the amendment to its pending application for full certification, CSDVRS provides updates to various documents submitted with its application, and hereby incorporates those documents by reference. Except as amended in this report or in the concurrently submitted third amendment to the CSDVRS application for full certification, CSDVRS certifies that the information and exhibits previously submitted to the Commission in connection with certification applications and/or annual compliance reports remain true and accurate.<sup>61</sup>

### **4. Procedures for Ensuring Compliance**

In order to ensure compliance with all of the FCC's rules governing VRS providers, CSDVRS continues to train all employees when they are hired and covered contractors when they are engaged. In addition, CSDVRS makes available online to all covered personnel a regularly updated VRS Compliance Manual which provides information on TRS rules and FCC guidance. CSDVRS continues to be informed about FCC decisions, actions, and

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<sup>60</sup> 47 C.F.R. § 64.5101 *et seq.*

<sup>61</sup> 47 C.F.R. § 64.606(g)(1).

policies by its Compliance officer and regularly studies all rule changes as they are implemented. CSDVRS instituted a Corporate and Regulatory Compliance Committee in 2010. It is a cross-sectional team to recommend and execute company-wide compliance policies in regard to corporate ethics and federal and state regulatory issues. CSDVRS has established a compliance plan describing its policies, procedures, and practices for complying with the TRS rules including preventing the unauthorized or unnecessary use of VRS. Pursuant to 47 C.F.R. § 64.606(g)(3), a copy of the compliance plan is attached hereto as Exhibit A. CSDVRS also has a corporate Code of Ethics, published on its website at <http://www.zvrs.com/about/code-of-ethics/> which is mandatory for all CSDVRS personnel, agents, and contractors to follow.

## 5. Conclusion

CSDVRS has provided and remains committed to providing VRS fully compliant with the Commission's rules and guidance. CSDVRS will continue to file annual compliance reports demonstrating continued compliance with these rules. CSDVRS appreciates the opportunity to provide high quality, innovative services, and products for VRS users.

Respectfully submitted,

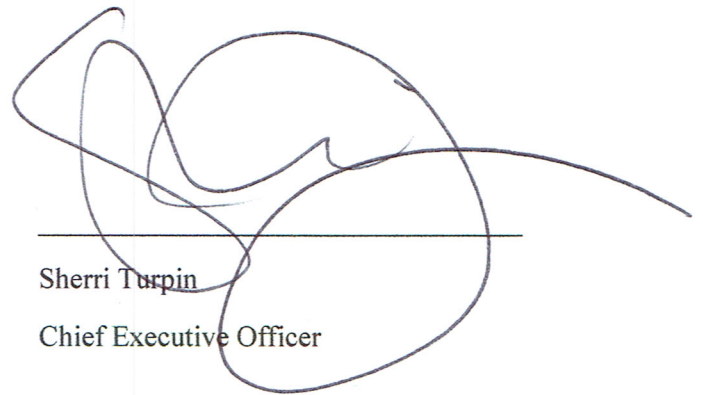
/s/ Sherri Turpin  
Sherri Turpin  
Chief Executive Officer  
CSDVRS, LLC

Gregory Hlibok  
Compliance Officer  
(443) 574-7042  
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November 21, 2016

CERTIFICATION

I swear under penalty of perjury that I am Sherri Turpin, an officer of the above-named reporting entity, and that I have examined the foregoing submissions, and that all information required under the Commission 's rules and orders has been provided and all statements of fact, as well as all documentation contained in this submission, are true.



A large, stylized handwritten signature in dark ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Sherri Turpin

Chief Executive Officer

Date: 11-21-16

EXHIBIT A

COMPLIANCE PLAN

[REDACTED]